

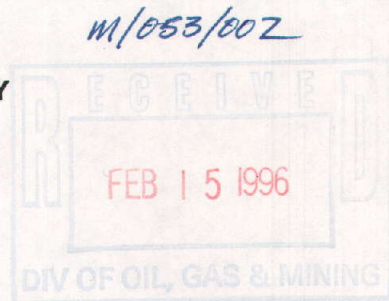


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

FEB - 1 1996



Ref: 8EPR-ER

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jerry Glazier
President
5M, Incorporated
P.O. Box 752
279 West State St.
Hurricane, UT 84737

Re: Removal Action Plans and
Schedule for the Leeds
Silver Reclamation Site,
Leeds, Utah

Dear Mr. Glazier:

As you are aware, the United States Environmental Protection Agency (EPA) has determined that a Removal Action is required at the Leeds Silver Reclamation Site in Leeds, Utah. EPA's decision is documented in the Action Memorandum dated December 7, 1994. The Removal Action shall mitigate and minimize damage to and provide adequate protection of public health, welfare, and the environment.

The following activities will be performed pursuant to the design and "Preferred Plan" provided by the Bureau of Reclamation and EPA at the January 24, 1995 meeting in Leeds, and will be implemented as described below.

1. Pregnant Pond

Water will be treated with sodium hydroxide and then spray evaporated. Remaining liquids in the electrowinning cells will be treated similarly. Sediment will be removed and placed on the heap. The liner will be inspected, and if compromised, will be removed to the heap and a new bentonite liner emplaced. This area will then be incorporated into the cap, with a monitoring well installed in the center of the pond area.



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2. Holding Pond

The holding pond will be dewatered by utilization for dust control. If remaining water exists after cap construction, it will be evaporated. The sediment and asphalt liner will be removed and placed on the heap, and the dike will be breached.

3. Cap/Cover Heap Leach & Pregnant Pond Stockpile

After the Bureau of Reclamation grades and compacts the stockpile area to post-settled slope of 3%, tailings will be utilized to provide a uniform cover. The geosynthetic membrane will be placed, and then native soil cover material will be placed, which will include waste rock to discourage vehicular traffic. A french drain will be constructed around the perimeter as described in the Preferred Plan.

4. Transformer, Ignitable Waste, and Corrosive Material

PCB contaminated concrete and debris in the warehouse will be removed and disposed of pursuant to the Toxic Substances Control Act.

Buried 5-gallon cans of ignitable waste and the corrosive material in the tank to the south of the Site will be overpacked and disposed of at a Subtitle C facility.

The following general schedule will apply to the Removal action. If significant deviations occur, I will provide you with an updated schedule.

<u>Significant Activity</u>	<u>Date/Duration, Days</u>
Site Walk Through	Feb. 8, 1996 8:00 a.m.
Equipment Mobilization:	Beginning 2/12/96
Water Treatment, Capping, etc:	Beginning Upon Completion of Equipment Mobilization
PCB, Ignitable, and Corrosive Waste Cleanup	Beginning Mid March
Completion of Cap:	May 30, 1996
Demobilization:	June 7, 1996
Disposal of PCBs, etc. (pends facility acceptance):	June 30, 1996

I anticipate occasional inspections of the cap at least yearly. EPA will terminate activities at the site upon satisfactory inspection results during the spring of 1998.

If you have any questions regarding the above activities or schedule, please call me at (303) 312-6799.

Sincerely,

A handwritten signature in dark ink, appearing to be "Peter D. Stevenson", written over a horizontal line.

Peter D. Stevenson, OSC
Response Branch

cc: Mia Wood, 8ENF-L
Jim Rhodes, 8ENF-T
Jason Knowlton, UDERR
D. Wayne Hedburg, UDOGM
Larry Gore, BLM - Dixie Resource Area
Craig Zufelt, BLM - Cedar City
Bill Wagner, BLM State Office